

RE: CHARLES S BREMNER
LESLIE LULE

) Case No. 19 B 21926
)
Debtors) Chapter 13
)
) Judge: DONALD R CASSLING

NOTICE OF MOTION

CHARLES S BREMNER
LESLIE LULE
5222 CLEVELAND ST
SKOKIE, IL 60077

CUTLER & ASSOC
via Clerk's ECF noticing procedures

Please take notice that on September 26, 2019 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on September 18, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On August 05, 2019 the Debtors filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtors has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend J - \$2299 vs plan for mortgage amount \$2399 and amend plan - #3.3 car max \$17345 filed \$17657.04 adequate protection payments.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,
/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
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(312) 294-5900